

### **REMARKS**

At the outset, the Applicants thank the Examiner for the thorough review and consideration of the pending application. The Office Action dated April 10, 2007 has been received and its contents carefully reviewed.

Applicants thank the Examiner for acknowledging that the arguments in Applicants' February 16, 2007 response were persuasive, and for withdrawing the Restriction Requirement between claims 1-41. Applicants also thank the Examiner for indicating that claims 23-24 and 39-40 would be allowable if written in independent form including all other the limitations of the base claim and any intervening claims.

Claims 1, 4, 30 and 40 are hereby amended. Claims 35, 38 and 39 are hereby canceled without prejudice or disclaimer. Paragraph 0045 was amended in accordance with the Office's direction. Figure 9C was amended to correct an inadvertent omission. No new matter has been added. Accordingly, claims 1-34, 36, 37, 40 and 41 are currently pending. Reexamination and reconsideration of the pending claims are respectfully requested.

The Office Action indicated that the element in Figure 9C designated with the reference number 440 is missing from the figure. As noted above, the Applicants have amended Figure 9C to include the illustration of element 440. As such, the Applicants request that the objection regarding Figure 9C be withdrawn.

The Office Action indicated that the information disclosure statement (IDS) filed February 13, 2006 was not considered because the submission fails to comply with 37 CFR 1.98 (a)(1). The Applicants note that this submission was a third party submission under 37 C.F.R. § 1.99, filed by Mr. Karl Hormann, Registration No.: 23,470. It is further noted that the reference included in this submission, U.S. Patent 4,618,193, was submitted by the Applicants in the IDS filed February 16, 2005 and the IDS filed March 28, 2006. The Examiner considered this reference on April 5, 2007. Therefore, Applicants submit that no further action is required in order to have this reference considered in the pending application. Applicants respectfully request the Office to acknowledge, in the next communication from the Office, that no further action is required in order to have U.S. Patent 4,618,193 considered in the pending application.

The Office Action further indicated that the reference (CN2424219, hereinafter “the ‘219 reference”) cited in the information disclosure statement (IDS) filed October 5, 2006 was not considered because the submission did not include a concise explanation of the relevance in English, as it is presently understood by the individual designated in 37 CFR 1.56(c). The relevance of the ‘219 reference is based on its citation in a first Office Action from the State Intellectual Property Office of P.R.C. (People’s Republic of China). An English translation of the Abstract of the ‘219 reference, is hereby submitted. For the convenience of the Office, Applicants attach herewith a new PTO-1449 Form listing only the ‘219 reference. Accordingly, the Applicants respectfully request that the Examiner consider the ‘219 reference cited in the IDS filed on October 5, 2006 and return a signed copy of the new PTO-1449 Form to the Applicants in the next communication.

Additionally, the Office Action objected to the specification for informalities noted therein. As noted above, Applicants have amended paragraph [0045] as required in the Office Action. As such, the Applicants request that the objection regarding the specification be withdrawn.

The Office Action also objected to claim 30 for informalities noted therein. The Applicants have corrected claim 30 accordingly, and ask the Examiner to withdraw this objection.

Initially, the Applicants wish to thank the Examiner for indicating that claims 23, 24, 39 and 40 include allowable subject matter.

**The Office Action rejected claims 1-13, 15, 19-22, 35 and 36 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 4,618,193 to *Cuthbert et al.* (hereinafter “*Cuthbert*”).** Applicants have cancelled claim 35, therefore the rejection of that claim is considered moot. The Applicants respectfully traverse the rejection of the remaining claims.

As required in Chapter 2131 of the M.P.E.P., in order to anticipate a claim under 35 U.S.C. §102, “the reference must teach every element of the claim.” The Applicants respectfully submit that *Cuthbert* does not teach every element recited in claims 1-13, 15, 19-22, and 36 and

therefore cannot anticipate these claims. Applicants' note that claim 1 is rewritten to include the subject matter of allowable claim 39 and all claims from which claim 39 depends, either directly or indirectly. More specifically, claim 1 has been amended to recite the allowable features of a washing machine which includes, among other features, "a body having ... projections projected forward from an upper reinforcing plate mounted on the upper part of a front part thereof; and a front panel rotatably engaged with a lower edge of the front part of the body, and detachably mounted on, the front part of the body and including slots in a rear surface of a top end thereof in correspondence to the projections." *Cuthbert* fails to disclose at least these features.

*Cuthbert* discloses a base panel 22 having a short vertical wall 58 which extends across the width of the base and has a narrow horizontal ledge 60 extending forwardly from the vertical wall 58. *Cuthbert* further discloses vertically disposed tabs 62 which have an upper laterally oriented edge 64 wider than a lower edge 66 which is connected to the ledge 60. *See column 2, lines 60-66 and Figures 2 and 4.* However, *Cuthbert* fails to disclose each and every feature of independent claim 1, namely "projections projected forward from an upper reinforcing plate mounted on the upper part of a front part thereof; and a front panel rotatably engaged with a lower edge of the front part of the body, and detachably mounted on, the front part of the body and including slots in a rear surface of a top end thereof in correspondence to the projections."

For at least the aforementioned reasons, the Applicants respectfully submit that claim 1 is patentably distinguishable over *Cuthbert*. Likewise, claims 2-13, 15, 19-22, 35 and 36, which depend from claim 1 are also patentable for at least the same reasons. Accordingly, Applicants respectfully request the 35 U.S.C. §102 (b) rejection of claims 1-13, 15, 19-22 and 36 be withdrawn.

**The Office Action rejected claims 14 and 16-18 under 35 U.S.C. § 103(a) as being unpatentable over *Cuthbert*.** The Applicants respectfully traverse the rejection.

As required in Chapter 2143.03 of the M.P.E.P., in order to "establish *prima facie* obviousness of the claimed invention, all the limitations must be taught or suggested by the prior art." As previously discussed, *Cuthbert* fails to teach or suggest each and every feature recited in claim 1, the independent claim from which claims 14 and 16-18 depend. Moreover, Applicants' note that claim 1 is rewritten to include the subject matter of allowable claim 39 and all claims

from which claim 39 depends, either directly or indirectly. The Office Action alleges that “it would have been obvious to one of ordinary skill in the art at the time of the invention was made to rearrange the further projections to guide and hold the vertical bent part from the lower portion to the upper portion, as claimed, since it has been held that rearranging parts of an invention involves only routine skill in the art.” Applicants respectfully disagree with this allegation. However, even if this were true and one of ordinary skill modified *Cuthbert* as suggested, the modified teaching still fails to teach or suggest all of the features of claim 1, namely “projections projected forward from an upper reinforcing plate mounted on the upper part of a front part thereof; and a front panel rotatably engaged with a lower edge of the front part of the body, and detachably mounted on, the front part of the body and including slots in a rear surface of a top end thereof in correspondence to the projections..” The Applicants further contend that one of ordinary skill in the art would not have been motivated to modify *Cuthbert* to include at least these features. Since *Cuthbert* and the modified teachings of *Cuthbert* as suggested in the Office Action fail to teach or suggest all of the features claimed in claim 1, the independent claim from which claims 14 and 16-18 depend, *Cuthbert* does not render the claimed invention obvious. Therefore, the Applicants submit that claims 14 and 16-18 are patentably distinguishable over the cited reference and request that the 35 U.S.C. § 103(a) rejection be withdrawn.

**The Office Action rejected claims 25-31 under 35 U.S.C. § 103(a) as being unpatentable over *Cuthbert* in view of U.S. Patent Application No. 2002/0190617 to *Banicevic et al.* (hereinafter “*Banicevic*”).** The Applicants respectfully traverse the rejection.

As previously discussed, *Cuthbert* fails to teach or suggest all of the features recited in claim 1, the base claims from which claims 25-31 depend. Moreover, *Banicevic* does not address the shortcomings of *Cuthbert*. In fact, *Banicevic* is only relied upon for its purported disclosure of a front wall of an appliance with brackets connecting the side flanges via cutouts with fastening holes for the purpose of bracing and stabilizing the front wall/door. *See page 7 of the Office Action.* Therefore, the Applicants submit that claims 25-31 are patentably distinguishable over the cited references and request that the 35 U.S.C. § 103(a) rejection be withdrawn.

**The Office Action rejected claims 32 and 33 under 35 U.S.C. § 103(a) as being unpatentable over *Cuthbert* in view of *Banicevic* and in further view of U.S. Patent No. 2,174,107 to *Kenny* (hereinafter “*Kenny*”).** The Applicants respectfully traverse the rejection.

As previously discussed, neither *Cuthbert* nor *Banicevic* teach or suggest all of the features recited in claim 1, the base claim from which claims 32 and 33 depend. Moreover, *Kenny* does not address the shortcomings of *Cuthbert* and *Banicevic*. In fact, *Kenny* is only relied upon for its purported disclosure of a cabinet bracket with rubber bushings or the like. See page 8 of the Office Action. Therefore, the Applicants submit that claims 32 and 33 are patentably distinguishable over the cited references and request that the 35 U.S.C. § 103(a) rejection be withdrawn.

**The Office Action rejected claim 34 under 35 U.S.C. § 103(a) as being unpatentable over *Cuthbert* in view of U.S. Patent No. 5,557,827 to *Lautenschlager et al.* (hereinafter “*Lautenschlager*”).** The Applicants respectfully traverse the rejection.

As previously discussed, *Cuthbert* fails to teach or suggest all of the features recited in claim 1, the base claims from which claim 34 depends. Moreover, *Lautenschlager* does not address the shortcomings of *Cuthbert*. In fact, *Lautenschlager* is only relied upon for its purported disclosure of a flange with reinforcing bead for improved strength and stiffening of the flange. See pages 8 and 9 of the Office Action. Therefore, the Applicants submit that claim 34 is patentably distinguishable over the cited references and request that the 35 U.S.C. § 103(a) rejection be withdrawn.

**The Office Action rejected claims 37, 38 and 41 under 35 U.S.C. § 103(a) as being unpatentable over *Cuthbert* in view of U.S. Patent No. 4,307,588 to *Smith et al.* (hereinafter “*Smith*”).** Applicants have cancelled claim 38, therefore the rejection of that claim is considered moot. The Applicants respectfully traverse the rejection of the remaining claims.

As previously discussed, *Cuthbert* fails to teach or suggest all of the features recited in claim 1, the base claims from which claims 37 and 41 depend. Moreover, *Smith* does not address the shortcomings of *Cuthbert*. In fact, *Smith* is only relied upon for its purported

disclosure of a front part of a washing machine cabinet with a reinforcing plate for stiffening purposes. *See page 9 of the Office Action.* Therefore, the Applicants submit that claims 37 and 41 are patentably distinguishable over the cited references and request that the 35 U.S.C. § 103(a) rejection be withdrawn.

The application is in condition for allowance and early, favorable action is respectfully solicited. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

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Respectfully submitted,

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Attachments



ANNOTATED SHEET

FIG. 9C

